## COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: PITTSBURGH MUNICIPAL COURT

Magisterial District Number: 05-0-03
Address: 660 FIRST AVENUE

PITTSBURGH, PA 15219

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## POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT: JESSICA (NAME and ADDRESS)
CREEKS

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Docket Number:	Date Filed:	OTN/LiveScan Number	POLICE CRIMIN	AL COMPLAINT
Defendant Name	First:	G 828625-0	Complaint/Incident to 192260	umber
- Constitution of the cons	JESSICA	Middle:	Last: CREEKS	

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The victims, whose true identities has been ascertained by proof positive and which is known through the collective knowledge of the Pittsburgh Bureau of Police, has been viewed and been memorialized in reports by your Affiant and other difficers.

The true identities of these known, but unnamed persons is being withheld for purposes of this affidavit, both to ensure their safety and to preserve the integrity of this on-going investigation. These known, but unnamed victims will be available to testify at all court proceedings, and will be referred to, for the purposes of this affidavit, as "Jane Doe" and "John Doe".

On January 4, 2019 Pittsburgh Public School Police Officer Borghini and Zone 1 Officer Erny were dispatched to 1018 Peralta St Pittsburgh PA 15212 for a female that had driven her children Jane and John Doe to school while intoxicated. On scene Borghini and Erny met with school principal Paula Heinzman who reported the mother, now identified as Jessica Creeks, came to the school to sign the children up for school and was visibly intoxicated. During this time Creeks admitted to Heinzman and Borghini that she was intoxicated and had driven the children to the location. Officer Borghini reported that he observed the security camera footage from the exterior of the building showing Creeks driver her 2005 Cadillac Seville (PA REG KWR-6982) to the school. She then exits the vehicle and enters the school. Heinzman stated that Creeks "smelled like a brewery" and was visibly drunk.

Officer Erny demonstrated Standardized Field Sobriety Tests (SFSTs) and then asked Creeks to perform. Enry reported that:

The first test conducted was finger to nose. Before starting the test, I demonstrated the test to her. I instructed her to touch her left ring finger to the tip of her nose, which she touched correctly. I again instructed her to touch her right middle finger, to the tip of her nose, which she missed, by touch her right side of the nose.

The next\_field sobriety test I demonstrated was the heel to toe test. Creeks missed touching heel to toe test on step seven and eight on the way up. When she came back on the line she missed touching heel to toe from\_steps six threw step ten.

I then requested and obtained the In car camera associated with Creeks transport to Special Deployment Divison (SDD) by Officer Erny. During the transport Creeks tells Officer Erny that she has cocaine in her system. Creeks was previously arrested by West Deer Police in October 2018 for CA 13 a 16 possession of a control substance to wit Adderall and a second count for possession of cocaine under OTN G 820975-1. Additionally I found a 2008 arrest by Allegheny County Police for CC 2702 Aggravated assault of a child Eric Kunesky and CC 4303 Endangering the Welfare of a Child for failure to get Eric medical attention for the injuries in a timely manner under G 452509-1. Creeks later pled guilty to CC 4304 Endangering the Welfare of a Child.

Creeks was transported to SDD for chemical testing. Chemical testing was not done and Creeks was later released at her home.

Your affiant submits that sufficient probable cause exists for the issuance of an arrest warrant for Jessica Creeks on the above charges.